

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SUSAN GLEASON, CANDI GABRIELSE,
Individually, and as representatives of a
Class of Participants and Beneficiaries
of the Bronson Healthcare Group, Inc.
403(b) Tax Sheltered Matching Plan,

Plaintiffs,

v.

BRONSON HEALTHCARE GROUP, INC.,

and

BOARD OF DIRECTORS OF BRONSON
HEALTHCARE GROUP, INC.,

and

JOHN DOE 1-30,

Defendants

Case No. 1:21-cv-00379-HYJ-PJG

Judge: Hon. Hala Y. Jarbou

Magistrate Judge Phillip J.
Green

HANEY LAW FIRM, P.C.
Troy W. Haney
330 E. Fulton
Grand Rapids, MI 49503
(616) 235-2300 - Phone
(616) 459-0137 - Fax
thaney@troyhaneylaw.com

JACKSON LEWIS, P.C.
Blaine Veldhuis
2000 Town Center, Suite 1650
Southfield, MI 48075
(248) 936-1900 – Phone
(248) 936-1901 - Fax
Blaine.Veldhuis@Jacksonlewis.com

WALCHESKE & LUZI, LLC
James A. Walcheske (WI# 1065635)
Scott S. Luzi (WI# 1067405)
Paul M. Secunda (WI#1074127)
235 N. Executive Dr., Suite 240
Brookfield, WI 53005
(262) 780-1953 – Phone
(262) 565-6469 – Fax
jwalcheske@walcheskeluzi.com
sluzi@walcheskeluzi.com
psecunda@walcheskeluzi.com

Howard Shapiro
Charles F. Seemann III
650 Poydras Street, Suite 1900
New Orleans, LA 70130
(504) 208-1755 - Phone
(504) 208-1759 - Fax
Howard.Shapiro@jacksonlewis.com
Charles.Seemann@jacksonlewis.com

Attorneys for Defendants

Attorneys for Plaintiffs

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, AND CLASS
REPRESENTATIVE SERVICE AWARDS**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on May 17, 2022 at 10:00 a.m., before the Honorable Hala Y. Jarbou, United States District Judge, in Courtroom 128 of the United States District Court for the Western District of Michigan, in Lansing, Michigan, Plaintiffs Susan Gleason and Candi Gabrielse ("Plaintiffs") will and hereby do move this Court for an Order awarding: (1) attorneys' fees to Class Counsel in the amount of \$1,000,000 (one-third of the \$3.0 million Gross Settlement Amount); (2) reimbursement of \$43,588.35 in litigation costs; and (3) class representative service awards in the amount of \$7,500 to each of the named Plaintiffs (\$15,000 total.)

This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Paragraphs 4 and 22-26 of the Parties' Class Action Settlement Agreement (*Dkt. 18-1*) and is based on the accompanying Memorandum of Law and authorities cited therein, the Declarations of Troy Haney and Paul Secunda, the previously filed declarations of the Class Representatives (*Dkt. Nos. 19, 20*), the Settlement Agreement, and all files, records, and proceedings in this matter.

Counsel for Plaintiffs have conferred with counsel for Defendants regarding this motion and have been advised that "Defendants take no position directly or indirectly on Class Counsel's application for attorneys' fees and expenses," because

Class Counsel has not requested an award of attorneys' fees higher than one-third, or 33.33%, of the Settlement Amount, totaling \$1,000,000, and has not requested expenses that exceed \$50,000. (*Dkt. 18-1*, ¶ 22.) As of the filing of this motion, there also have been no objections to the proposed attorneys' fees and costs, administrative expenses, or Class Representative service awards.

Dated this 19th day of April, 2022

WALCHESKE & LUZI, LLC

s/ Paul M. Secunda

James A. Walcheske*

Scott S. Luzi*

Paul M. Secunda**

* admitted pro hac vice

** admitted in W.D. Mich.

235 N. Executive Dr., Suite 240

Brookfield, Wisconsin 53005

Telephone: (262) 780-1953

Fax: (262) 565-6469

E-Mail: jwalcheske@walcheskeluzi.com

E-Mail: sluzi@walcheskeluzi.com

E-Mail: psecunda@walcheskeluzi.com

HANEY LAW FIRM, P.C.

Troy W. Haney

330 E. Fulton

Grand Rapids, MI 49503

Telephone: (616) 235-2300

Fax: (616) 459-0137

E-Mail: thaney@troyhaneylaw.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2022, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Dated: April 19, 2022

s/Paul M. Secunda
Paul M. Secunda